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8 Attorney for Defendant  
9 **GINA TCHIKOVANI**

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 UNITED STATES OF AMERICA, ) No. 3:10-CR-00100 MHP  
14 Plaintiff, )  
15 v. ) **STIPULATION TO CONTINUE CHANGE**  
16 GINA TCHIKOVANI, ) **OF PLEA HEARING**  
17 Defendant. )  
18 \_\_\_\_\_ )

19 **THE PARTIES HEREBY STIPULATE AS FOLLOWS:**

20 Defendant Gina Tchikovani's change of plea hearing is presently scheduled for  
21 September 13, 2010, at 10:00 a.m. The parties have agreed to continue the hearing to a future  
22 date to afford defendant additional time to adequately prepare for the hearing. This additional  
23 time is necessary because of the respective schedules of both the government and defense  
24 counsel, as well as the volume of loan-related documents in the case.

25 Assistant United States Attorney, Tracie L. Brown, has no objection to continue  
26 Defendant's change of plea hearing from September 13, 2010 to October 18, 2010 at 10:00 a.m.

27 The parties hereby stipulate that the change of plea hearing scheduled for September 13,  
28 2010, at 10:00 a.m. be continued to October 18, 2010, at 10:00 a.m. The parties further agree that  
time should be excluded based on the need for effective preparation and continuity of counsel, as

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1 defense counsel will be out of town for a week in October and there is a court holiday scheduled  
2 for October 11, 2010.

3 IT IS SO STIPULATED:

4 Dated: September 8, 2010

/s/ Charles F. Bourdon  
By: CHARLES F. BOURDON  
Attorney for Defendant  
GINA TCHIKOVANI

7 Dated: September 8, 2010

/s/ Tracie L. Brown  
By: TRACIE L. BROWN  
Attorney for Plaintiff

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8 Attorney for Defendant  
9 **GINA TCHIKOVANI**

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 UNITED STATES OF AMERICA, ) No. 3:10-CR-00100 MHP  
14 )  
15 Plaintiff, )  
16 )  
17 v. ) **~~PROPOSED~~ ORDER TO CONTINUE**  
18 ) **CHANGE OF PLEA HEARING**  
19 )  
20 GINA TCHIKOVANI, )  
21 )  
22 Defendant. )  
23 \_\_\_\_\_ )

24 Pursuant to the stipulation submitted by Defendant Gina Tchikovani, with the consent of  
25 Assistant United States Attorney Tracie L. Brown and based therefor, upon the representation of  
26 counsel and for good cause shown, the Court finds that failing to exclude the time between  
27 September 13, 2010 and October 18, 2010 would unreasonably deny the defendant continuity of  
28 counsel and would deny counsel the reasonable time necessary for effective preparation, taking  
into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further  
finds that the ends of justice served by excluding the time between September 13, 2010 and  
October 18, 2010 from computation under the Speedy Trial Act outweigh the interests of the  
public and the defendant in a speedy trial.

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1 IT IS HEREBY ORDERED that the change of plea hearing in the above entitled matter  
2 scheduled on September 13, 2010 be continued to October 18, 2010 at 10:00 a.m.

3 IT IS SO ORDERED

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5 Dated: 9/9/2010  
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